

1 Lonnie D. Giamela (SBN 228435)  
E-Mail: lgiamela@fisherphillips.com  
2 Vana Ebrahimi (SBN 332805)  
E-Mail: vebrahimi@fisherphillips.com  
3 FISHER & PHILLIPS LLP  
4 444 South Flower Street, Suite 1500  
Los Angeles, California 90071  
Telephone: (213) 330-4500  
5 Facsimile: (213) 330-4501

6 Attorneys for  
SNAPMEDTECH, INC. DBA SNAPNURSE

7 Bruce J. Highman  
8 HIGHMAN & HIGHMAN  
A PROFESSIONAL LAW ASSOCIATION  
9 582 Market Street, Suite 1212  
San Francisco, CA 94104  
10 Attorney for Plaintiff  
CINDY COLLEY

11 UNITED STATES DISTRICT COURT  
12 NORTHERN DISTRICT OF CALIFORNIA  
13

14 CINDY COLLEY, an individual,  
15 Plaintiff,

16 v.

17 SNAPNURSE, INC.,  
18 Defendants.  
19

Case No: 4:22-cv-03884-HSG

*[Removed from Sonoma County  
Superior Court Case No. SCV-270782]*

**JOINT STIPULATED SCHEDULE  
REGARDING PLAINTIFF'S  
MOTION FOR LEAVE TO FILE  
SECOND AMENDED COMPLAINT;  
ORDER**

20  
21 Complaint Filed: May 9, 2022  
FAC: May 18, 2022  
22 Trial Date: Not Set

23  
24 Plaintiff CINDY COLLEY ("Plaintiff") and Defendant SNAPMEDTECH,  
25 INC. dba SNAPNURSE ("Defendant") (collectively, the "Parties"), by and through  
26 their respective counsel of record herein, hereby stipulate and agree as follows:  
27

1 WHEREAS, on July 19, 2022, Plaintiff filed a Motion for Leave to File a  
2 Second Amended Complaint and set the hearing for January 5, 2023, which was  
3 the first hearing date Plaintiff could obtain without permission from the Court;

4 WHEREAS, on August 1, 2022, the parties met and conferred to see if the  
5 parties can come to an agreement regarding Plaintiff's Second Amended  
6 Complaint, specifically related to Plaintiff's new claim under the Private Attorneys  
7 General Act("PAGA");

8 WHEREAS, on August 1, 2022, the Parties met and conferred regarding the  
9 potential impact on Plaintiff's new PAGA claim of the motion for preliminary  
10 approval of the PAGA settlement in *PHUC QUAN TRAN, et al. vs*  
11 *SNAPMEDTECH, INC., et al.*, Los Angeles Superior Court Case No.  
12 21STCV31264, which is set for hearing on August 17, 2022t and in which Plaintiff  
13 is currently a part of the settlement group. ;

14 WHEREAS, the Parties have agreed to continue the dates for the Opposition  
15 and Reply briefs to a date a month after the hearing in the *Tran* matter;

16 WHEREAS, the Parties have met and conferred and have agreed to the  
17 following briefing schedule:

18 NOW, THEREFORE, it is agreed and stipulated by the parties as follows:

19 1. Defendant will serve its Opposition to Plaintiff's Motion for Leave no  
20 later than September 16, 2022.

21 2. Plaintiff will serve its Reply no later than October 21, 2022.

22  
23 IT IS SO STIPULATED.

24 //

25 //

26 //

27 //

DATE: August 2, 2022

FISHER & PHILLIPS LLP

By: /s/ Vana Ebrahimi

Lonnie D. Giamela  
Vana Ebrahimi  
Attorneys for  
SNAPMEDTECH, INC. dba SNAPNURSE

DATE: August 2, 2022

HIGHMAN & HIGHMAN

By: /s/ Bruce J. Highman

Bruce J. Highman  
Attorney for  
CINDY COLLEY

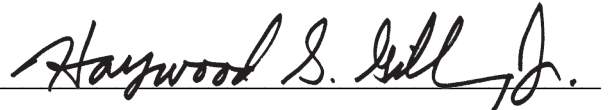
**ORDER**

Having read the foregoing stipulation and agreement of the Parties, and for good cause appearing, IT IS HEREBY ORDERED:

1. The last day for Defendant file and serve its Opposition to Plaintiff's Motion for Leave to File Second Amended Complaint is September 16, 2022.

2. The last day for Plaintiff to file her Reply to Defendant's Opposition is October 21, 2022.

IT IS SO ORDERED.



Honorable Haywood S. Gilliam, Jr.

United States District Court Judge